

**UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF WISCONSIN
MILWAUKEE DIVISION**

DAFINA ROTER VELYOV,

Plaintiff,

-vs-

Case No.: 2:14-cv-00071-RTR

**FRONTIER AIRLINES, INC. and
REPUBLIC AIRWAYS HOLDINGS INC.,**

Defendant.

**DEFENDANTS' MOTION FOR EXTENSION OF DISCOVERY DEADLINE
(CIV. L. R. 7(h) EXPEDITED NON-DISPOSITIVE MOTION)**

Defendants, Frontier Airlines, Inc., and Republic Airways Holdings Inc., by counsel, and pursuant to Fed. R. Civ. Proc. 26 and Civ. L. R. 7(h), respectfully move the Court for an extension of time for the parties to complete discovery, and in support thereof state as follows:

1. On June 2, 2014, Defendants filed their Motion for Partial Judgment on the Pleadings and supporting Memorandum. (*See* ECF Nos. 20 and 21).
2. On August 4, 2014, the Court set May 15, 2015, as the discovery deadline in this case. (Scheduling Conference Call Minutes (ECF No. 28)).
3. On October 14, 2014, Defendants filed their motion for summary judgment and related filings in this case. (*See* ECF Nos. 33-35).
4. On October 16, 2014, the Court issued its Decision and Order granting Defendants' Motion for Partial Judgment on the Pleadings. (See ECF No. 36).
5. Defendants have conducted limited written discovery in this case to date. Defendants have refrained from conducting additional discovery in this matter while their motion

for summary judgment remains pending in the interest of conserving the time and resources of all parties in this case. The only additional discovery that Defendants anticipate needing to conduct in this matter should the Court deny their motion for summary judgment would be to depose Plaintiff (for trial preparation purposes).

6. On February 5, 2015, the Court advised the parties that it is reviewing Defendants' motion for summary judgment. (Order Denying Plaintiff's Motion for Extension of Time, at 5 ECF No. 40)). As of the date of this Motion the Court has not ruling on Defendants' motion for summary judgment.

7. Defendants do not file this motion for the purpose of vexation or delay, but rather in a good faith effort to progress this case in a judicious and efficient manner.

8. Pursuant to Civ. L. R. 7(a)(2), the undersigned hereby certifies that no memorandum or other supporting papers will be filed in support of this Motion.

WHEREFORE, Defendants respectfully request that the Court vacate the current May 15, 2015, deadline and reset the discovery deadline to thirty (30) days after the Court's ruling on Defendants' motion for summary judgment, if needed.

Respectfully submitted,

s/ David J. Carr

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Attorneys for Defendants, Frontier Airlines, Inc.
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CERTIFICATE OF SERVICE

I hereby certify that on the 24th day of April, 2015, I electronically filed the foregoing with the Clerk of the Court using the CM/ECF system, and forwarded a copy of the filing via United States, first-class mail, to the following:

Dafina Roter Velyov
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s/ David J. Carr _____

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